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# UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION – SAGE  
 MEMORIAL HOSPITAL, INC. (doing business  
 as “Sage Memorial Hospital”); an Arizona non-  
 profit corporation

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,  
 LLC; a Nevada limited liability company (doing  
 business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

### JOINT STIPULATION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF’S SECOND AMENDED COMPLAINT [ECF No. 144]

### (FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED that Defendants Razaghi  
 Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively,  
 “Defendants”) shall have a brief one-week extension of time, up to and including August  
 23, 2021 to respond to Plaintiff’s Second Amended Complaint (ECF No. 144). Although  
 this is the first request relating to the Second Amended Complaint, Defendants did receive

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extensions relating to their response to the First Amended Complaint. The parties now stipulate to this short extension due to defense counsels' current case load, including recent last-minute efforts to prepare for and attend mediation in order settle a matter set for trial in mid-September 2021. Additionally, two out of six attorneys in defense counsels' office have been out of the office dealing with unexpected and serious health issues for themselves or family members, causing increased workloads for the remaining attorneys in the office. The additional time requested herein will permit counsel for Defendants to meet other case commitments and allow Defendants sufficient time to prepare, review, and finalize their response to the Second Amended Complaint, especially considering the complexity of the issues in this case and the length and breadth of the Second Amended Complaint. This request is made in good faith and not for the purpose of delay. Neither party will be prejudiced by the requested extension.

For the reasons set forth above, the parties ask the Court to approve this stipulation to extend the time for Defendants to respond to the First Amended Complaint from August 16, 2021 up to and including August 23, 2021.

RESPECTFULLY SUBMITTED this 13th day of August 2021.

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IT IS SO ORDERED:

  
 UNITED STATES MAGISTRATE JUDGE

Dated: August 13, 2021